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February 23, 2016

VIA ECF

Hon. Judge Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: **Jane Doe v. Steven Kogut**
Civil Action No.: 15-CV-7726

Dear Judge Furman:

We submit this joint letter to provide the Court with all pertinent information required under the October 1, 2015 Order.

The nature of the above action involves seeks damages to redress the injuries that Plaintiff has allegedly suffered as a result of allegedly being physically assaulted, sexually harassed, battered and isolated. Plaintiff states several causes of action under state and federal law proscribing gender motivated violence and negligence. Defendant's principal defense is that the allegations of the Complaint are totally false and the truth does not support the Complaint's stated causes of action.

Plaintiff alleges that jurisdiction lies in this Court on the basis of diversity of citizenship Plaintiff is an individual who is a citizen of the State of Florida, and the individual Defendant is a citizen and resident of the State of New Jersey. Venue is alleged under 28 U.S.C. §1391(b).

Currently, there are not existing deadlines, due dates, and/or cut-off dates. Further, there are no outstanding motions and there has been no discovery or settlement discussions. Defendant believes that there are novel issues arising in this case given the Plaintiff's invoking of the federal Gender Motivated Violence Protection Act and its corresponding state law.

As this Court is aware, Defendant recently filed his respective answer on February 17, 2016. In light of the foregoing, the parties respectfully apologize for the delay in filing this joint letter. A proposed Civil Case Management Plan and Scheduling Order is attached hereto.

Respectfully submitted,

/s/Zack Holzberg

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